

KAUFMAN INVESTMENT Company

MAILING ADDRESS
2151 E. DUBLIN-GRANVILLE RD.
SUITE B283
COLUMBUS, OHIO 43229
614/899-1229

June 6, 1986

Mr. Chuck M. Taylor, Chief
Division of Solid & Hazardous Waste Management
Ohio Environmental Protection Agency
State of Ohio
P. O. Box 1049
361 East Broad Street
Columbus, Ohio 43266-1049

Re: Columbus Coated Fabrics' Marble Cliff Quarries
Disposal Site

Dear Mr. Taylor:

I am writing in response to your letter of March 20, 1986, forwarding a Preliminary Assessment Narrative and Preliminary Assessment Forms for the Columbus Coated Fabrics ("CCF") disposal site located at The Marble Cliff Quarries property in Columbus, Ohio.

We appreciate the opportunity to review and respond to the information presented in the Preliminary Assessment Narrative and Preliminary Assessment Forms. We would appreciate it if you would include this letter in your files and in any materials sent to the U.S. Environmental Protection Agency in order to make the record on the Columbus Coated Fabrics' disposal site as accurate and complete as possible.

The Preliminary Assessment Narrative contains several factual errors. A reading of the Preliminary Assessment Narrative gives the impression that there was one disposal site on the property during Kaufman Investment Company's ownership of the property which contained both sanitary landfill (residential) wastes and industrial wastes from the Columbus Coated Fabrics ("CCF") plant. That is not the case. There was a sanitary landfill on the property that was used by the City of Upper Arlington and several other suburban communities from about 1947 to 1972, but it was sited in a location different from this CCF disposal site. Therefore, we believe the reference to a 1969 inspection report by the Ohio Department of Health relating to the sanitary landfill is erroneously included in the Preliminary Assessment

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OHIO EPA

JUN 09 1986

[IV. of SOLID & HAZ. WASTE M.G.]

ROGER H

PLEASE DRAFT
AN ACKNOWLEDGEMENT...

THANKS, [Signature]

OHD 980 50226

tested to FIT
3-25-86

US EPA RECORDS CENTER REGION 5



456366

Narrative. (The 1969 report applies to a different type of waste disposal operation conducted at a different time and in a different location. By 1969, the CCF waste disposal operation had been terminated for many years. We also believe that the references to other site investigations by undisclosed parties are irrelevant to consideration of the CCF site, which was not a sanitary landfill.)

The Preliminary Assessment Narrative is also in error when it states that Kaufman Investment Company was the owner of CCF prior to the time that the company was acquired by Borden, Inc. Kaufman Investment Company was never the owner of any part of CCF. CCF was an entirely separate corporation.

The Preliminary Assessment Narrative does not accurately reflect the circumstances under which the CCF disposal site was located or operated. The site for the CCF disposal site was selected because there was a mudseam in that location which made the land unsuitable for quarrying. Mudseams are common in the general area and are the result of pre-glacial drainage systems that were later filled with clay, silt and sometimes glacial debris. Mudseam materials normally are not readily penetrable by liquid percolation.

The boundaries of the clay seam in the CCF disposal site area were well known, based upon extensive core drilling done in the ordinary course of operation of the quarry, and provided the reason for not quarrying in that location. The area was avoided for quarrying operations because the horizons of stone quarried for commercial purposes were missing. Normal procedure for testing stone reserves was to drill a grid pattern of test holes to locate areas where the commercial grade stone horizons were not present. Test holes were normally drilled to a depth of 50 feet directly under all of the estimated 1.55 acres of CCF waste area. Additionally, the bottom of the CCF disposal site is located, I believe, at an elevation of not less than 760 feet. This puts the CCF disposal site well above the 100-year flood plane. Reference in the Preliminary Assessment Narrative to a gradient toward the river therefore is not appropriate as the gradient referred to is the dip of the stone beds, which, as noted, are not present in the area of the CCF disposal site.

Since the CCF waste is protected from leaching into the limestone beds by a considerable thickness of clay, we do not expect any leachate in groundwater or into the river.

The Preliminary Assessment Narrative also is in error when it suggests that waste limestone and flume sand were used in CCF's


Mr. Chuck M. Taylor, Chief
June 6, 1986
Page 3

waste disposal operations. The CCF waste disposal site was operated from 1951 to 1959. There was no stone crushing plant in this area (west of Scioto River, west of Dublin Road, south of Scioto Darby and north of Trabue Road) at the time. Waste limestone or flume sand was not used in the CCF disposal site operations, as these materials were not available in the immediate vicinity. Rather, CCF's filling operation was layered and compacted with stripping (dirt and clay) as recommended in those days.

The CCF waste site was used solely by CCF. Waste material was hauled to that site by CCF trucks. By an agreement with The Marble Cliff Quarries Company, CCF (now Borden, Inc.) accepted full responsibility for any liability for the site. CCF supplied liability insurance and a bond (Buckeye Union Casualty) as security for its undertaking. A copy of an endorsement to that policy is attached. Borden purchased CCF in 1961, and agreed to "assume all of the existing liabilities of CCF except certain liabilities to its shareholders as such, and except certain type of liabilities excluded under the plan of reorganization." The liability for the CCF waste was not excluded.

Again, Kaufman Investment Company appreciates the opportunity you extended to us by your letter of March 20, 1986, to review and submit corrective information on the Preliminary Assessment Narrative and the Preliminary Assessment Forms.

Very truly yours,


John S. Kaufman
President

JSK/lmk

Form 431
ENDORSEMENT

In consideration of the premium charged it is hereby understood and agreed that such insurance as is afforded under Division #5 of the Definition of Hazards applies to that part of the contract made between the named Insured and the Marble Cliff Quarries, reading as following:

"The Columbus Coated Fabrics Corp. shall comply with appropriate regulations of any health authorities having jurisdiction. The Columbus Coated Fabrics Corp. shall created no nuisance upon said premises and in the event of the existence of any nuisance caused or permitted by it's acts or those of it's agents, employees or contractees, the Columbus Coated Fabrics Corp. shall abate the same.

In the event of any claim, action or proceeding against Marble Cliff before or after the termination of this license on account of actions or conditions caused or permitted during existence of this license by the Columbus Coated Fabrics Corp., it's agents, employees or contractees, in relation to the Subject matter of this agreement, the Columbus Coated Fabrics Corp. will, at it's own expense, defent and save harmless Marble Cliff on account thereof."

COPY

Effective Date of Endorsement 7-24-51 Effective Date of Policy 7-24-51 Date Endorsement Is Issued 7-25-51
This Endorsement is subject to the terms, conditions, limitations and agreements of the Policy to which it is attached insofar as the same are not consistent with the specific undertakings of this Endorsement.
This Endorsement, when countersigned by a duly authorized agent and attached to Policy No. OLT-64541
issued to Columbus Coated Fabrics Corp.
shall be valid and form a part of said policy.
Countersigned at Columbus, Ohio this 24th day of July 19 51

The Buckeye Union Casualty Company

Anna L Morris

SECRETARY

John A. Sullivan

Authorized Agent

Form 431 (20M 351)
(3) the word "sales" shall mean the gross amount or money charged for all goods and products sold or distributed during the policy period by the Named Insured and by concessionaires trading under his name and the gross amount of money charged by the Named Insured for such operations shall include taxes, except that

one accident; the limit of such liability stated in the Declarations as applicable to "each accident" is, subject to the above provision respecting each person, the total limit of the Company's liability for all damages, including damages for care and loss of services, arising out of bodily injury, sickness, or disease, including death

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(IV. of SOLID & HAZ. WASTE M.G.)

ROGER H
PLEASE DRAFT
AN ACKNOWLEDGEMENT...
THANKS, [Signature]

Wanted it moved
earlier
Suggested
[unclear]

Where?
[unclear]

Narrative. (The 1969 report applies to a different type of waste disposal operation conducted at a different time and in a different location. By 1969, the CCF waste disposal operation had been terminated for many years. We also believe that the references to other site investigations by undisclosed parties are irrelevant to consideration of the CCF site, which was not a sanitary landfill.)

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What does
Borden say?

What was the
CCF site?

What was the
and what
was going
operation?

Not
true

What
Borden
operation
was going
on?

What info
exists about
the quarry
and the
mudseam
of the site?

Where?
Borden
Quarry

Where?


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Again, Kaufman Investment Company appreciates the opportunity you extended to us by your letter of March 20, 1986, to review and submit corrective information on the Preliminary Assessment Narrative and the Preliminary Assessment Forms. *Who did Borden buy it from?*

Very truly yours,


John S. Kaufman
President

JSK/lmk

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Endorsement, when countersigned by a duly authorized agent and attached to Policy No. OLT-64541
Valid and form a part of said policy.
Columbus Coated Fabrics Corp.
Columbus, Ohio
The Buckeye Union Casualty Company this 24th day of July 19 51

Ann L. Morris
SECRETARY
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one accident; the limit of such liability stated in the Declarations as applicable to "each accident" is, subject to the above provision respecting each person, the total limit of the Company's liability for all damages, including damages for care or custody arising out of bodily injury

Authorized Agent